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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,) Criminal No. CR 06-0725 SI

16 Plaintiff,)

17 v.)

18 TREVOR GRAHAM,)

19 Defendant.)

20 _____
21 STIPULATION AND [PROPOSED]
22 ORDER EXCLUDING TIME

23 The above-captioned matter came before the Court on March 30, 2007, for trial setting.

24 The defendant was represented by Gail Shifman, Esq., and the government was represented by
25 Jeffrey Finigan, Assistant United States Attorney. The matter was continued to June 22, 2007,
26 for hearing on defense motions, September 11, 2007, for pre-trial conference, and September 24,
27 2007 in this Court for trial.

28 The Court made a finding that the time from and including March 30, 2007, through

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September 24, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until September 24, 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: April 20, 2007

/s/

GAIL SHIFMAN
Counsel for Trevor Graham

DATED: March 30, 2007

/s/

JEFFREY FINIGAN
Assistant U.S. Attorney

So ordered.

DATED:


SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE